

**AFFIDAVIT**

Colin Simons, being duly sworn, deposes and states:


1. I am a Special Agent with the Federal Bureau of Investigation (FBI) currently assigned to the Rutland Vermont Resident Agency in the Albany Division of the FBI. I have been a federal law enforcement officer for over 15 years. I make this affidavit to show probable cause to believe that a 2011 Jeep Patriot, VIN 1J4NF1GB6BD156857 (the "Jeep"), is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), as property which constitutes or is derived from proceeds traceable to violations of 18 U.S.C. § 2113(b). The Jeep therefore became the property of the Government, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

2. On December 3, 2020, a grand jury sitting in Burlington in the District of Vermont returned an indictment charging Matthew Morgan with one count of bank larceny, in violation of 18 U.S.C. § 2113(b). This indictment was filed in U.S. District Court for the District of Vermont on December 3, 2020, and is incorporated herein by reference. (Copy attached). The grand jury found that probable cause exists to believe that the Jeep is forfeitable to the United States on the grounds that it constitutes or is derived from proceeds traceable to the offense

charged in Count 1. As further evidence of probable cause, I ask the court to incorporate by reference my October 28, 2020 affidavit in support of a warrant to search a cellphone seized from Matthew Morgan.

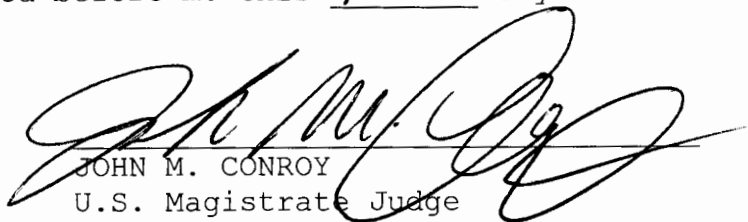
3. Therefore, I respectfully assert that grounds exist to seize the above-referenced Jeep pursuant to 21 U.S.C. § 853(f) because there is probable cause to believe that the Jeep is subject to forfeiture and an order pursuant to 21 U.S.C. § 853(e) may not be sufficient to assure the availability of the property for the forfeiture in the future. The Jeep may be seized under civil forfeiture process pursuant to 21 U.S.C. § 881(b) and 18 U.S.C. § 981(b)(1).

10<sup>th</sup> Dated at Burlington, in the District of Vermont, this day of December, 2020.



COLIN SIMONS  
Special Agent, FBI

Sworn to and subscribed before me this 10<sup>th</sup> day of December, 2020.



JOHN M. CONROY  
U.S. Magistrate Judge